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Case No.: 06-2456 JL

STIPULATION TO EXTEND THE DUE DATE FOR PLAINTIFF'S REPLY TO DEFENDANT'S RESPONSE TO THE **COURT'S ORDER TO SHOW CAUSE;** AND | KKOKOSEKO ORDER

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

Yoav Shaul, Plaintiff, VS. Michael Chertoff, Secretary, Department of Homeland Security; Emilio T. Gonzalez, Director, United States Citizenship and Immigration Services, and David Still, **District Director, United States Citizenship** and Immigration Services, Defendants.

Plaintiff, Yoav Shaul, by and through his undersigned attorney and defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to an extension of the due date for Plaintiff's reply to Defendants' Response to the Court's Order to Show Cause, in the above-entitled action for the following reasons:

- 1. Plaintiff filed his mandamus action on April 7, 2006.
- 2. This Court [Hon. Jeffrey S. White] issued an order to Show Cause on May 11, 2006, directing the defendants to show cause on or before June 2, 2006, why a writ of mandamus should not be granted.

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1		3.	The parties agreed to two extensions of Defendants' response.
2			Defendants' response was due on July 14, 2006. Plaintiff's reply is due on
3			July 21, 2006.
4		4.	On July 14, 2006, Defendants filed their response indicating that Plaintiff
5			would be interviewed on July 20, 2006, concerning his application for
6			adjustment of status.
7		5.	On July 20, 2006, Plaintiff was interviewed at Citizenship and
8			Immigration Services regarding his application for adjustment of status.
9		6.	Also on July 20, 2006, the parties received notice that the case was
10			reassigned to Judge Larson and that a case management conference has
11			been scheduled for August 30, 2006.
12		7.	Based on the interview, the parties believe that a decision will be
13			forthcoming and that there is a reasonable possibility that this case may be
14			administratively resolved before the case management conference.
15		Accordingly,	the parties stipulate to extend the date of Plaintiff's reply to Defendants'
16	Respo	nse to the Orde	r to Show Cause to August 15, 2006. The parties do not request a change
17	to the	case manageme	ent conference, which is scheduled for August 30, 2006.
18			
19	Date:	July 21, 2006	Respectfully submitted,
20			
21			GERI N. KAHN <sup>1</sup>
22			Attorney for Plaintiff
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28	produc	<sup>1</sup> I, Geri N. Kah	n, attest that both Edward A. Olsen and I have signed this stipulation and will
	produc	e me ongmai sig	ned copies upon request.

STIPULATION TO EXTEND THE DATE OF PLAINTIFF'S REPLY C 06-2456  $\,$  JL  $\,$  -  $\,$  2

KEVIN V. RYAN United States Attorney

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EDWARD A. OLSEN

Assistant United States Attorney Attorneys for Defendants

Pursuant to stipulation, IT IS SO ORDERED

Date: July 24, 2006

Date: July 21, 2006

